

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)
)
) No. 18 CR 107
v.) Chief Judge Ruben Castillo
)
)
JOSEPH KIM)

**GOVERNMENT'S AGREED MOTION FOR AN EXTENTION OF TIME TO RETURN
INDICTMENT PURSUANT TO 18 U.S.C. §3161(h)**

The UNITED STATES OF AMERICA, by its attorney, JOHN R. LAUSCH, Jr., United States Attorney for the Northern District of Illinois, respectfully moves this Court, pursuant to 18 U.S.C. §3161(h)(8), for a 30-day extension of time, to and including May 17, 2018, in which to see a return of an indictment against defendant, for the following reasons.

1. On February 16, 2018, defendant had his initial appearance pursuant to a complaint charging him with wire fraud, in violation of Title 18, United States Code, Section 1343. Defendant was released on bond that day.

2. The government is continuing its investigation in this matter, including interviewing witnesses and reviewing financial records to determine the scope of the charged wire fraud scheme. The government has also produced certain discovery to defense counsel, and the parties have engaged in on-going discussion since then. Defendant's counsel concurs with the request for an extension of time to indict.

3. Given these factors, the government, with the agreement of defendant, is requesting an additional 30 days from the current expiration of April 17, 2018 to and including May 17, 2018. This is the government's first request for an extension of time in this matter.

Wherefore, the United States respectfully requests a 30-day extension of time to and

including May 17, 2018 in which to seek an indictment in this case.

Respectfully submitted,

JOHN R. LAUSCH, JR.
United States Attorney

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Dated: April 13, 2018